

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

MARQUES JORDAN and BRONDA
JORDAN, individually and as
guardian and next of kin of
ADISYN JORDAN

Plaintiffs

vs.

Civil No. 1:09 CV 00079

GRACO CHILDREN'S PRODUCTS INC.
d/b/a GRACO and/or GRACO BETA

and

NEWELL RUBBERMAID INC.

And

RUBBERMAID INC.

Defendant.

AFFIDAVIT OF RUSSELL J. WILSON

STATE OF TENNESSEE

COUNTY OF KNOX

COMES NOW the Affiant, RUSSELL J. WILSON, and after being duly sworn,
states and deposes as follows:

1. My name is RUSSELL J. WILSON, and I am over the age of eighteen and
competent to give this Affidavit.
2. I am a Vice-President of Investments at UBS Financial Services Inc., Wages
Wilson Group, located at First Tennessee Plaza, 800 South Gay Street,
Knoxville, TN 37929. My telephone number is 800-827-2723.

3. UBS Financial Services is a registered broker-dealer. It is therefore subject to oversight by the United States Securities and Exchange Commission (SEC), whose "Net Capital" rule is designed to protect against the risk of a broker-dealer's failure. The Net Capital rule specifies levels of positive net worth below which a firm's net capital may not fall. (See "Account Protection at UBS" attached hereto).
4. UBS Financial Services operates in compliance with the SEC's net capital requirements and maintains regulatory net capital at levels substantially exceeding those required under the Net Capital rule. As of December 31, 2009, UBS Financial Services' net capital was \$1,348.1 million which is \$1,259.2 million in excess of the minimum required by the SEC. (See "Account Protection at UBS" attached hereto).
5. Because UBS Financial Services is a registered broker-dealer, assets are further protected by the Securities Investor Protection Corporation (SIPC). SIPC's reserve funds are used to supplement the distribution, up to a ceiling of \$500,000 per customer, including a maximum of \$100,000 for cash claims. (See "Account Protection at UBS" attached hereto).
6. UBS Financial Services also maintains supplemental insurance with London Insurers. UBS Financial Services supplemental policy is subject to policy conditions and limitations and has an aggregate policy limit, which was \$500 million as of March 23, 2009. Within this aggregate policy limit, cash is protected up to \$1.9 million for all client accounts held in different capacities at UBS Financial Services (e.g., an individual account and a joint account are

each protected up to \$2 million for each account). (See "Account Protection at UBS" attached hereto).

7. I have been employed in the financial industry for more than 10 years. As part of my ongoing professional education, I was the recipient of the Transatlantic Business Exchange Scholarship and completed a course of study in international business at the University of Westminster in London, England. I was also awarded a Certified Investment Management Analyst (CIMA) designation by the Investment Management Consultants Association. (See "The Wages Wilson Group Brochure" attached hereto).
8. I have met with Marques and Bronda Jordan, Adisyn Jordan's parents, to discuss Adisyn's future financial situation and to solicit their opinion on the most appropriate structure for Adisyn.
9. The structured settlement proposal that has been presented to Adisyn Jordan's parents provides for three payments, [REDACTED] payable at age 18 (July 8, 2025), [REDACTED] payable at age 21 (July 8, 2028), [REDACTED] payable at age 30 (July 8, 2037).

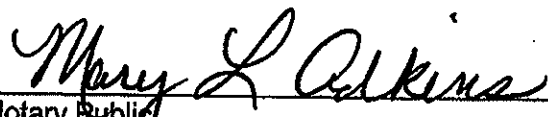
FURTHER THE AFFIANT SAYETH NOT.



RUSSELL WILSON

Sworn to and subscribed before me this 2nd day of September, 2010.

My commission expires: 11-4-12


Notary Public

